

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BALTIMORE DIVISION

JASON ALFORD, DANIEL LOPER, WILLIS
MCGAHEE, MICHAEL MCKENZIE, JAMIZE
OLAWALE, ALEX PARSONS, ERIC SMITH,
CHARLES SIMS, JOEY THOMAS, and LANCE
ZENO, Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY & SURVIVOR
BENEFIT PLAN; THE NFL PLAYER
DISABILITY & NEUROCOGNITIVE BENEFIT
PLAN; THE BERT BELL/PETE ROZELLE NFL
PLAYER RETIREMENT PLAN; THE
DISABILITY BOARD OF THE NFL PLAYER
DISABILITY & NEUROCOGNITIVE BENEFIT
PLAN; LARRY FERAZANI; JACOB FRANK;
BELINDA LERNER; SAM MCCULLUM;
ROBERT SMITH; HOBY BRENNER; and
ROGER GOODELL,

Defendants.

Case No. 1:23-cv-00358-JRR

PLAINTIFFS' MOTION TO COMPEL DISCOVERY

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Rule 104.8 of the Local Rules of this Court, Plaintiffs respectfully move the Court to compel Defendants to produce all documents responsive to Requests Nos. 2 and 3 of Plaintiffs' First Set of Requests to Defendants for Production of Documents ("Requests 2 & 3").

The reasons supporting this motion are set forth in the accompanying memorandum of law and the accompanying Declaration of Benjamin R. Barnett, dated November 26, 2024. A proposed Order also accompanies this motion.

WHEREFORE, Plaintiffs respectfully request that the Court grant the instant motion and compel Defendants to produce all documents responsive to Requests 2 & 3.

Dated: November 26, 2024

Respectfully submitted,

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